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CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

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6 Attorneys for petitioner Telscape Communications, Inc.

7 UNITED STATES DISTRICT COURT
 8 CENTRAL DISTRICT OF CALIFORNIA

9 TELSCAPE COMMUNICATIONS, INC.,

10 Petitioner,

11 v.

12 RIGHTSCORP, INC.,

13 Respondent.

14
 15
 16 IN RE SUBPOENA TO TELSCAPE
 17 COMMUNICATIONS, INC.

Case No.

CV12-8833 - DSF
(JCG)

Underlying Case No. 2:12MC317

DECLARATION OF SHERRI
 FLATT IN SUPPORT OF
 PETITION TO QUASH OR
 MODIFY SUBPOENA

Accompanying documents:
 Notice of Petition; Memorandum of
 Points and Authorities; Declaration
 of Michelle J. Wells; Declaration of
 Gary Hamlett; [Proposed] Order

18 I, Sherri Flatt, declare as follows:

19 1. I am the Executive Director of Regulatory Affairs for Telscape
 20 Communications, Inc., a telecommunications company based in Los Angeles,
 21 California ("Telscape"). In my position with Telscape, I am primarily responsible
 22 for compliance with applicable statutes and regulations and in responding to legal
 23 process, such as subpoenas. I have personal knowledge of the matters contained in
 24 this declaration and if called to testify to them could and would do so competently.

25 2. The subpoena at issue by this motion was not served personally on
 26 myself or any other individual at Telscape. Rather, the subpoena was served via
 27 facsimile on or about August 24, 2012. I am unaware of any agreement by
 28 Telscape to accept service via facsimile.

3. Following issuance of this subpoena, I was personally contacted by a representative of Rightscorp, Inc. He indicated that we should expect further subpoenas directing Telscape to identify the customers associated with certain internet protocol addresses. The subpoena issued to Telscape has been burdensome on our business operations, and prior reimbursement for the costs associated with subpoenas such as this will greatly alleviate the burden on Telscape in complying therewith.

Sherri Flatt
Sherri Flatt